

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

Jaime Rodriguez,

Plaintiff,

v.

The City of Perth Amboy; Perth Amboy
Police Department; Roman McKeon in his
official capacity as Acting Chief of Police of
the Perth Amboy Police Department; Officer
Jonathan Coronado Castillo, Badge # 0248;
Officer Enmanuel Pena-Sanchez, Badge #
unknown; Officer Davis Salazar, Badge #
unknown; Officer Rafael Bengochea, Badge #
unknown; John Doe 1-10; and State Agency
1-10,

Defendants.

Index No.: 2:17-CV-03349-ES-SCM

Civil Action: Violation of Civil Rights

JOINT PRETRIAL CONFERENCE LETTER

The following shall constitute the joint letter relative setting forth any issues to be addressed by the parties at the pretrial conference scheduled for March 29, 2022 at 9:00 a.m.

APPEARANCES:

Hamill Patel, Esq.
Jarred S. Freeman, Esq.
The Law Offices of Jarred S. Freeman, LLC
3840 Park Avenue, Suite 202A
Edison, NJ 08820
Phone: 732-494-7900
Attorneys for Plaintiff

Joseph B. O'Toole, Jr., Esq.
O'Toole, Couch & Della Rovere LLC
14 Ridgedale Avenue, Suite 205
Cedar Knolls. NJ 07927
Phone: 973-428-4433
Attorneys for Defendants

ISSUES TO BE RAISED BY PLAINTIFF

1. Amend Pretrial Order to reflect marked exhibits (P1, P2, etc.) as opposed to the present listing (a, b, etc.)
2. Amend Pretrial Order to include the following additional exhibits:
 - a. Defendants' Answers to Admissions
 - b. Pictures of Plaintiff's Aunt's backyard from google maps
 - c. NJ.com Use of Force Report
 - d. Perth Amboy Police Department Policy & Procedures – Use of Force
 - e. Plaintiff's Municipal Court Case Search (MCCS)
3. Amend Pretrial Order to include the following additional witnesses that may be called at trial¹:
 - a. Carla Astudillo – designed and created NJ Use of Force Report
 - b. Craig McCarthy – coordinated data collection and input for the NJ Use of Force Report
 - c. Blake Nelson – NJ Use of Force Report
 - d. Erin Petenko – data auditing and analysis NJ Use of Force Report
 - e. Disha Raychaudhuri – data auditing and analysis NJ Use of Force Report
 - f. S.P. Sullivan – data auditing and analysis NJ Use of Force Report
 - g. Stephen Stirling – data auditing, analysis and database integrity NJ Use of Force Report
 - h. Yan Wu – interactive data visualizations NJ Use of Force Report
4. Admissibility of Plaintiff's criminal history over 10 years old
5. Whether the parties can stipulate to the admission and authenticity of medical records and bills
6. Use of various news articles regarding the PAPD
7. Whether the footage of Officer Santiago and Officer Reynoso may be used as rebuttal should any witness testify to their training, the Department's general training, the Department's policies, or other "customs"

ISSUES TO BE RAISED BY DEFENDANTS

1. Amend pretrial order to include the following additional witnesses that may be called at trial:
 - a. Officer Birch
 - b. Officer Miranda

¹ These potential witnesses were previously identified in an amendment to Plaintiff's answers to Interrogatories.

2. Amend pretrial order to include additional incident reports relative to incidents referred to during discovery, including Incident #14030099 dated 6/28/14.
3. Whether plaintiff is going to and/or is entitled to set forth a cognitive, psychiatric claim.
4. Whether the parties can stipulate as to dismissal of the claim as to the City of Perth Amboy.
5. Whether punitive damages are available as to defendants City of Perth Amboy and the Perth Amboy police department.

/s/ Hamill Patel, Esq.

/s/ Jarred S. Freeman, Esq.

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